

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Northern Division

MACKINAC CENTER FOR PUBLIC
POLICY,

Plaintiff,

v.

U.S. DEPARTMENT OF EDUCATION;

MIGUEL CARDONA, Secretary, U.S.
Department of Education, in his official capacity;

RICHARD CORDRAY, Chief Operating Officer
of Federal Student Aid, U.S. Department of
Education, in his official capacity;

Defendants.

CIVIL CASE NO. 1:23-CV-10795-TLL-
PTM

**DECLARATION OF JOSEPH G.
LEHMAN**

DECLARATION OF JOSEPH G. LEHMAN

1. I, Joseph G. Lehman, President of the Plaintiff Mackinac Center for Public Policy Institute (“Mackinac Center”) am over the age of 18 years old.

2. I graduated from the University of Illinois College of Engineering and hold a BS degree in Engineering.

3. I have been the President of the Mackinac Center for 15 years and make this declaration on my own knowledge and the records of the organization.

4. The Mackinac Center is organized as a § 501(c)(3) organization under the Internal Revenue Service Code and is incorporated in the State of Michigan.

5. The Mackinac Center’s mission is to enhance quality of life in Michigan by developing free-market policies, challenging government overreach, and fostering a climate of public opinion that encourages policymakers to act in the public interest.

6. The Mackinac Center currently has approximately 45 employees working to fulfill its mission.

7. At the time of this declaration, the Mackinac Center has two employment opportunities open and available for which it seeks new employees to help fulfill its mission.

8. The Mackinac Center employs, has employed, and seeks to recruit for employment individuals who have federal student loans.

9. The Mackinac Center currently has four employees who are participating in the Public Service Loan Forgiveness (PSLF) program, and it has previously employed workers who participated in PSLF.

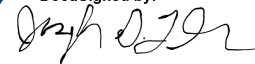
10. As a matter of economic logic, the Department of Education's administrative pause of monthly payments and the accrual of interest on student loans reduce the financial incentive for college-educated workers with student-loan debt to seek loan forgiveness under PSLF through employment with public service employers like the Mackinac Center. These extensions have disadvantaged and will continue to disadvantage the Mackinac Center in the market for such employees.

11. Additionally, by counting periods of non-payment during the administrative student-loan pause as monthly payments for the PSLF program, the Department of Education effectively shortens the service-and-payment period for all PSLF participants nationwide, including the Mackinac Center's current employees. This diminishes the benefits that the Mackinac Center receives from the PSLF program with respect to its current employees and future hires who participate in that program.

12. By counting periods of non-payment during the administrative student-loan pause as monthly payments for Income-Driven Repayment (IDR) programs, the Department of Education makes loan-forgiveness under IDR relatively more attractive than loan-forgiveness under PSLF. This discourages the borrowers from seeking loan-forgiveness under PSLF, thereby diminishing the benefits that the Mackinac Center receives from the PSLF program.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: October 6, 2023

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Joseph G. Lehman, President, Mackinac Center